



AkzoNobel

Tomorrow's Answers Today

September 28, 2010

VIA Federal Express # 7939 5664 9549

Craig Whitenack, Civil Investigator
United States Environmental Protection Agency
Region IX, Southern California Field Office
600 Wilshire Avenue, Suite 1460
Los Angeles, California 90017

**Re: Yosemite Creek Superfund Site, San Francisco, CA Response to 104(c)
Information Request on behalf of U.S. Cellulose**

Dear Mr. Whitenack,

Please accept this letter in follow up to my discussions with Michael Massey in the Office of Regional Counsel and in response to the August 24, 2010 letter and supplemental request for information ("SRFI") from the United States Environmental Protection Agency ("EPA") to Akzo Nobel Coatings Inc. (for U.S. Cellulose) ("ANCI") with regard to the Yosemite Creek Superfund site (the "Site"). Subject to both the general and specific objections noted in U.S. Cellulose initial response dated January 4, 2010, and without waiving these or other available objections or privileges, ANCI submits the following in response to the SRFI.

By way of background, during the period of time in question, U.S. Cellulose manufactured various types of wood coatings in California. U.S. Cellulose was acquired by AMT in 1999-2000. AMT was acquired by Chemcraft in 2004 and AN acquired Chemcraft in 2007.

Although ANCI is the appropriate entity to respond to this RFI and SRFI, ANCI has no files relating to the time period in question – 1940-1988 as the end of this time period pre-dates the Chemcraft acquisition by 19 years and the acquisition by Chemcraft of AMT by 23 years and the acquisition by AMT of U.S. Cellulose by 27 years.

In responding to the RFI and SRFI, ANCI has undertaken a diligent and good faith search for, and review of, documents and information in its possession, custody or control investigated this matter by reviewing any relevant files and interviewing employees of the former operators/owners of any predecessors during the period in question in order to identify any relevant information regarding the entities identified in the RFI and the details regarding any contractual dealings between those entities and U.S. Cellulose.

As indicated in ANCI's initial response to the RFI, U.S. Cellulose operated at 1547 Almaden Road in San Jose, California from the 1960s until moving to 520 Parrot Street in San Jose in the late 1970s or early 1980s. As described in the 1993 letter from U.S.

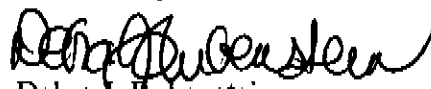
Cellulose to the DTSC, no record was found identifying any relationship between U.S. Cellulose and Bedini Steel Drum, San Francisco Steel Drum, Waymire Drum or Bay Area Drum Company. U.S. Cellulose also explained in the 1993 letter that it was possible that a small number of drums could have been purchased from Bay Area Drum but no employees at the time had any recollection of returning any drums to Bay Area Drum or any other dealings with the related entities identified. The 1993 letter also indicated that since the early 1980s U.S. Cellulose had a relationship with Myers Drum of Oakland California for the purchase of drums and the return of used drums for reconditioning. However, ANCI has no records of the dealings between Myers Drum and U.S. Cellulose.

The only records provided EPA relating to U.S. Cellulose further demonstrate that the limited relationship between U.S. Cellulose and Bay Area Drum involved the purchase of drums by U.S. Cellulose. The records reveal that U.S. Cellulose purchased drums from Bay Area Drum only twice in 1981 and twice in 1982. There is only one record indicating the receipt of drums from U.S. Cellulose in November of 1981 and that receiving ticket identifies the drums as inventory. Therefore, it does not appear that the drums were returned for reconditioning. I enclose copies of these documents provided by EPA to ANCI.

ANCI has no additional information or documents responsive to this request related to these sites. ANCI has been unable to locate any documents or information that would indicate any relationship with the Bay Area Drum Facility, the Bay Area Drum Company or any of its owners, agents, representatives, employees or predecessors. Based on our review, it is our understanding that U.S. Cellulose had no other manufacturing facilities in California during the time period at issue.

Should EPA have any questions regarding this supplemental response feel free to contact me at 914-333-7488.

Very truly yours,



Debra J. Rubenstein
Senior Regulatory Counsel HSERA
Akzo Nobel Inc.